

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Court File No. 05 CV 440 MJD/JGL

Bernarda Rivas, as general conservator,  
By and on behalf of her daughter,  
Theresa Castilleja,  
Plaintiff,

**PROTECTIVE ORDER**

Minneapolis Public Schools and Special  
School District No. 1, municipal subdivisions,  
Richard Kantorowicz, Bruce Gilman, and  
Rasheedah Ali, individuals,

Defendants.

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WHEREAS Hennepin County Human Services Department, Adult Protection  
Services Department conducted a Vulnerable Adult Investigation regarding allegations of  
abuse against Theresa Castilleja;

WHEREAS Hennepin County, including Hennepin County Children, Family & Adult  
Services has provided services to Theresa Castilleja, a developmentally disabled adult;

WHEREAS, Hennepin County's data regarding Theresa Castilleja is classified as  
private data under state and federal law including under the Minnesota Government Data  
Practices Act, Minn. Stat. §13.46 and Reporting of Maltreatment of Vulnerable Adults Minn.  
Stat. §626.557 subd. 12b;

WHEREAS, the Court seeks to review some or all of the above data regarding  
Theresa Castilleja prior to approval of a settlement in the above-entitled case;

WHEREAS, after applying the criteria set forth in Minn. Stat. § 13.03, subd. 6, the Court orders Hennepin County to produce the above data regarding Theresa Castilleja to the attorney for the plaintiff and the attorney for the defendants pursuant to this Protective Order so that further relevant information may be provided to the Court;

**IT IS HEREBY ORDERED:**

1. The documents to be produced in response to this Order shall be considered “Confidential Materials” under the terms of this Order, and this Order shall govern the examination and use of such documents.
2. The documents and information to be produced / provided in response to this Order include:
  - a. The Vulnerable Adult Investigation Report regarding allegations of abuse against Theresa Castilleja, P-28382943;
  - b. Documentation and all information regarding the services currently being provided to Theresa Castilleja by Hennepin County and future services to be provided to Ms. Castilleja by Hennepin County;
  - c. This Order specifically authorizes Hennepin County Social Workers to discuss the information identified in paragraph 2 b. with the counsel identified in paragraph 3 in order to provide an affidavit, documents or other information to the Court.
3. The documents and information set forth in paragraph 2 a-c shall be produced / provided to counsel for plaintiff, John A. Klassan, 10 South Fifth Street, Suite 700, Minneapolis, MN 55402 and counsel for defendants, Margaret A. Skelton, Ratwik,

Roszak & Maloney, 300 U.S. Trust Building, 730 Second Ave. South,  
Minneapolis, MN 55402.

4. Some or all of the Confidential Materials and information derived therefrom shall be disclosed to the Court.
5. Confidential Materials or information derived therefrom shall not be disclosed to any other person or persons unless the person is represented by counsel in this matter or the person is employed by counsel's respective law firms.
6. If Confidential Materials are to be filed in Court, such papers shall be labeled "Confidential," filed under seal, and kept under seal until further order of the court.

**ORDER**

IT IS HEREBY ORDERED, Hennepin County shall produce the above-described documents to counsel for plaintiff and counsel for defendants pursuant to the protections set forth above.

Dated: July 5, 2006

s / Michael J. Davis  
Honorable Judge Michael J. Davis